

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
DIVISION

Appendix A
United States Courts
Southern District of Texas
FILED

April 25, 2024

Nathan Ochsner, Clerk of Court

Larry Bryant

versus

Texas City ISD

CIVIL ACTION NO. 3:24-cv-116

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EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5.

2. The Plaintiff is:

Larry Bryant

Address:

6806 Anderson St.
Texas City, TX 77591

County of Residence:

Galveston

3. The defendant is:

- Texas City ISD

Address:

1700 9th Ave N
Texas City, TX 77590

☐ Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses.

4. The plaintiff has attached to this complaint a copy of the charges filed on Jan 24th 2024 with the Equal Opportunity Commission.

5. On the date of 2-10-2024, the plaintiff received a Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the plaintiff's:

- (a) ☐ race
- (b) ☐ color
- (c) ☐ Sex
- (d) ☒ Religion
- (e) ☐ national origin,

the defendant has:

- (a) ☐ failed to employ the plaintiff
- (b) ☒ terminated the plaintiff's employment
- (c) ☐ failed to promote the plaintiff
- (d) ☒ other: Due to advanced notice to Supervisor
of my disability, I was placed in
a position for which I was not hired
for creating harm to my already ailment

7. When and how the defendant has discriminated against the plaintiff:

On about 9-1-22, the Supervisor terminated me
when I would not readily ride in a car w/ an openly
gay male to go out in public which I plainly told
Human Resource, it was against my religion

8. The plaintiff requests that the defendant be ordered:

- (a) ☐ to stop discriminating against the plaintiff
- (b) ☐ to employ the plaintiff
- (c) ☒ to re-employ the plaintiff
- (d) ☐ to promote the plaintiff
- (e) ☐ to my job as a bus driver & my overall status

as a TCISD employee & tenure as
a substitute teacher and that;

- (f) ☒ the Court grant other relief, including injunctions, damages, costs and attorney's fees.

L Bryant
(Signature of Plaintiff)

Address:

6806 Anderson St
Texas City, TX 77591

Telephone:

409-354-6034

email lar.bry2@gmail.com

Appendix B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
DIVISION

Larry Bryant

versus

TCISD

CIVIL ACTION NO. _____

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ORIGINAL COMPLAINT

To whom it may concern:
Having previously filed my complaint with US Court
I found it necessary to amend with a specific
charge of "reverse sexual orientation discrimination
and disability violation in the work place. By no
means, I condemn anyone of their sexual preferences
but I feel by what transpired over several months
where both supervisors being of different
sexual orientation decided to use exploits,
scare tactics to favor a relationship with the
individual to ride in the car with when there
were several others could be chosen. This same
person invaded my privacy in a bathroom when
he normally would use the one next to
his office. My bus was intentionally placed
next to his when beginning + ending our routes
+ during lineups before picking up kids in the
afternoon. There are several instances where
the head supervisor would make things
difficult even terminating earlier than yr 2021
(on back)

I was reinstated when HR reviewed the matter. This 2nd ^{time} a minor incident when washing my bus led him (supervisor) to abruptly terminate me. Regarding my disability, I rode in the cabin of the bus for 5 months that has resulted in aggravation to my spinal condition. I was hired to work as a bus driver. Now I am receiving intense physical therapy where I may work ~~again~~ again. I specifically informed TCISD reasons to work as a bus driver instead of sub teaching was due covid against immuno deficiency and had a designed plan to protect against covid when driving the bus. I believe by being a member of the Church of Christ seem to bother my supervisor when he heard myself & a coworker share scriptures with each other but in a discreet manner.

Note: This filing is an amendment to filing as of 7-26-2023 and of August 24, 2023 with US District Court Houston Div.